

September 5, 2007

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SEP 10 2007

Federal Communications Commission  
Office of the Secretary

Commissioner Deborah Taylor Tate  
Federal Communications Commission  
445 12<sup>th</sup> Street SW, 8<sup>th</sup> Floor  
Washington, DC 20554

Re: WC Docket No. 06-147; Frontier Communications Petition for Forbearance from  
Title II and Computer Inquiry Requirements for Broadband Services

Dear Commissioner Tate:

I wanted to contact you regarding Frontier Communications' petition regarding the above mentioned docket in which we are seeking regulatory forbearance for our company's commercial broadband transmission services and strongly urge you to grant this petition. Providing Frontier with regulatory relief, which is similar to that already provided to Verizon, will permit the consumers in our markets to have the ability to enjoy benefits of a truly competitive broadband market and removes the shackles of pricing regulation. Granting Frontier's petition for forbearance is a natural progression of broadband deregulation and is in the public interest.

Frontier is not the dominant broadband provider in any of the relevant markets in terms of addressable market share. Frontier faces competition in its serving areas from alternative facilities-based, broadband competitors as well as providers that purchase special access DS1 or DS3 services from Frontier. The companies, in turn, bundle broadband services, such as Ethernet service, to the customer over those connections. In many cases these are cable television operators or national telecommunications providers who have access to financial resources many times greater than Frontier. The fact that there is less regulation on these entities provides advantages to competitors with greater resources than Frontier in the largest growth area in our industry, broadband.

The Commission should have no concern about granting Frontier this regulatory relief based upon the competitive and consumer success realized from the deregulation of the broadband Internet access market. Obviously, the requested additional forbearance in the commercial broadband service market would only serve to bring additional market-based competition to the benefit of all customers. If the public interest is truly the key element to the approval of any forbearance request, then granting Frontier's petition will serve to benefit communities by accelerating competition and the deployment of advanced broadband technology in its markets.

If you have any questions regarding the positions asserted by Frontier or regarding the subsequent data filed with the Commission last week, please do not hesitate to give me a call. Thank you again for your consideration.

Sincerely,



Maggie Wilderotter  
Chairman & CEO



Lima Communications Corp.

1424 Rice Avenue  
Lima, Ohio 45805  
419-228-8835  
www.wlio.com

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Lima, Ohio 45802  
FAX 419-229-7091  
NEWS FAX 419-225-6109



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SEP 10 2007

Federal Communications Commission  
Office of the Secretary

The Honorable Kevin J. Martin, Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Thursday, September 06, 2007

CC: Michael J. Copps, Commissioner  
Jonathan S. Adelstein, Commissioner  
Deborah Taylor Tate, Commissioner  
Robert M. McDowell, Commissioner  
James Jordan, Congressman 4<sup>th</sup> District

The Digital Television Transformation scheduled for February 17, 2009, is quickly approaching. WLIO Television, a leader in the community of Lima, Ohio, has met the requirements of the FCC to replicate our service area.

Since 1953, WLIO has provided news, weather, sports, education, and public service to viewers in West Central Ohio. Our household ratings during almost 3 hours of daily news, and comments from the public during times of emergency have shown us to be needed by the public for the distribution of information.

During August 2007, WLIO sent 59 Emergency Alerts to the public, which included the communities of Findlay, Bluffton, and Ottawa, Ohio, all stricken by severe storms.

These storms caused so much damage that six Ohio counties were declared federal disaster areas. Of those counties, Allen, Hancock, Putnam, and Wyandot counties are all served by WLIO-DT. We also have partial viewership in Crawford County. WLIO performed extensive news coverage of the events, broadcasting from the communities. As of the writing of this letter, we are still informing the public with news reports from civic leaders, and federal officials.

Nearly ten years ago, ex-FCC Chairman Kennard wrote a "Report to Congress" about the power of local television. His conclusions at the end of the report speaks of the public service and community needs that local television serves. Since that time nothing has changed. Local TV is still a high priority to the public.

My nearly 40 year background in broadcasting is technical in nature, so I do not fear changing to digital. I am also the area's EAS co-chairman, and a Communications Deputy for the Allen County Office of Homeland Security. I know firsthand the need of local television to communities in times of emergency. I also know that the public depends on television as their primary source for local news.

Would not it be a shame if in the transition to digital local television is crippled by an inability to deliver a signal to the public? What would be the reaction of the public if they lost access to signals that they have always had access to?

Conversations with my neighbors and the general public have me very concerned. I fear that as the digital transition occurs many citizens of the United States will be left out in the cold without any access to local news plus information, and emergency information distributed through the E.A.S.

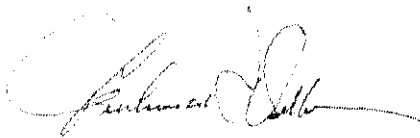
Cable television is preferred by viewers in our area. Satellite services do nothing for local news and emergencies. In some areas the public is prohibited from installing reasonable antennas for reception of "over the air" DTV broadcasts due to local covenants, building codes, and NIMBY.

In our community there are very few "real" digital receiver sets. The majority of receivers are analog "legacy" sets, purchased within the past 5 years, with at least 5 to 10 more years of dependable service. Many of these sets are owned by low income, as well as senior citizens who do not have the money nor the knowledge to change to 8VSB digital receivers.

The F.C.C. should consider some sort of mandatory carriage of digital signal(s), with the provision that subscribers are provided with the necessary down conversion equipment for their analog sets. This should include all streams transmitted by a station.

This carriage should apply to any digital television station whom has had an analog presence on a cable system in the past five year.

I believe the F.C.C. would do the public a great disservice if it did not mandate cable carriage for any station presently on a cable system.

A handwritten signature in black ink, appearing to read 'Frederick R. Vobbe', with a stylized flourish at the end.

Frederick R. Vobbe  
Chief Engineer, Vice President  
WLIO Television, Lima OH



Thomas E. Mac Arthur  
WPFO FOX23  
233 Oxford Street  
Suite 35  
Portland, ME 04101  
(207)-347-7309

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SEP 10 2007

Federal Communications Commission  
Office of the Secretary

September 6, 2007

Federal Communications Commission  
445 12<sup>th</sup> Street, NW  
Washington, DC 20554

Dear FCC Commissioners:

After reading the CableTV Viewability Proposal, I am writing to you in support of the proposal. This is the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition.

TV signals must be protected from material degradation so that consumers can reap the full benefits of HDTV.

Sincerely,

Thomas E. Mac Arthur

TEM/dlh

C: The Honorable Kevin J. Martin, Chairman (via email)  
The Honorable Michael J. Copps, Commissioner (via email)  
The Honorable Jonathan S. Adelstein, Commissioner (via email)  
The Honorable Deborah Taylor Tate, Commissioner (via email)  
The Honorable Robert M. McDowell, Commissioner (via email)  
Marsha MacBride, Exec. VP, Legal & Regulatory Affairs, NAB  
(via email)

**WPFO-TV**

T: 207.828.0023 • F: 207.347.7323  
233 Oxford Street, Suite 35 • Portland, ME 04101  
myFOXMaine.com



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SEP 10 2007

Harry J. Pappas  
CHAIRMAN /  
CHIEF EXECUTIVE OFFICER

September 6, 2007

Federal Communications Commission  
Office of the Secretary

The Honorable Deborah Taylor Tate  
Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington DC 20554

Dear Commissioner Tate:

I am writing to you on a matter of urgent concern to the future of broadcasting. I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and am writing to express my strong support for the Commission's "viewability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) down converting the digital must-carry channels and carrying both the digital and analog signals for these channels and (b) carrying the local must-carry signals in digital only and providing the necessary equipment to ensure that all subscribers can view those signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules to digital carriage, and believe that the Commission's proposal in this regard will ensure that every cable customer receives the full benefits of digital television.

Many thanks for your many efforts to ensure a smooth DTV transition for all television viewers, and for your leadership on this issue.

Sincerely,

Harry J. Pappas



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SEP 10 2007

Federal Communications Commission  
Office of the Secretary

September 6, 2007

The Honorable Deborah Taylor Tate  
Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Dear Commissioner Tate:

I would like to respectfully address an issue which will come to your attention on September 11, 2007. It is of supreme importance to all Americans regarding how they receive their television signals.

The **CableTV Viewability Proposal** will protect analog cable subscribers from loss of service after February 17, 2009. It will also ensure the signal will be of a quality nature and not downgraded. This is a base line right of retransmission of the signals broadcasters own.

I ask that you vote in support of the **CableTV Viewability Proposal**.

Most Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Hayes".

Michael J. Hayes  
President & General Manager  
WYFF 4

**From:** Dennis Fannin [mailto:d.fannin@osage.net]  
**Sent:** Thursday, September 06, 2007 3:07 PM  
**To:** Michael Copps; Kevin Martin; Jonathan Adelstein; Deborah Tate; Robert McDowell  
**Subject:** Proposed Triple Carriage Must-Carry Order

September 6, 2007

To the Members of the United States Senate  
To the Members of the United States House of Representatives

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SEP 10 2007

Federal Communications Commission  
Office of the Secretary

**Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order**

Dear Members of the Federal Communications Commission Board:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and denying access to broadband services.

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of



the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

Dennis M. Fannin  
General Manager  
Osage Municipal Utilities  
[d.fannin@osage.net](mailto:d.fannin@osage.net)  
Ph: (641) 832-3731  
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SEP 10 2007

Federal Communications Commission  
Office of the Secretary

September 5, 2007

Federal Communications Commission  
445 12<sup>th</sup> Street, NW  
Washington, DC 20554

Dear FCC Commissioners:

After reading the CableTV Viewability Proposal, I am writing to you in support of the proposal. This is the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition.

TV signals must be protected from material degradation so that consumers can reap the full benefits of HDTV.

Sincerely,

Ed Groves  
President & General Manager

cc: The Honorable Kevin J. Martin, Chairman (via email)  
The Honorable Michael J. Copps, Commissioner (via email)  
The Honorable Jonathan S. Adelstein, Commissioner (via email)  
The Honorable Deborah Taylor Tate, Commissioner (via email)  
The Honorable Robert M. McDowell, Commissioner (via email)  
Marsha MacBride, Exec. VP, Legal & Regulatory Affairs, NAB  
(via email)

325 EMMETT AVENUE SUITE N BOWLING GREEN, KY 42101

WWW.WNKY.NET

Country Cablevision  
9449 State Hwy 197 South  
Burnsville, NC 28714  
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SEP 10 2007

Federal Communications Commission  
Office of the Secretary

September 5, 2007

The Honorable Deborah Taylor Tate  
Commissioner

**Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order**

Dear Honorable Tate:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and denying access to broadband services.

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

**"YOUR WINDOW TO THE WORLD"**

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ray V. Miller". The signature is fluid and cursive, with the first name "Ray" and last name "Miller" clearly distinguishable.

Ray V Miller  
Vice-President

**From:** Erin Lutts [mailto:elutts@midrivers.com]  
**Sent:** Thursday, September 06, 2007 11:49 AM  
**To:** Adam Healy; Jaime Ramsey Graham; Deborah Tate; Kevin Martin; Jonathan Adelstein; Michael Copps; Robert McDowell; jon\_selib@baucus.senate.gov  
**Cc:** aca@americancable.org; dmitchell@ntca.org  
**Subject:** FCC Proposed Triple Carriage Must-Carry Order  
**Importance:** High

September 6, 2007

To the Members of the United States Senate  
To the Members of the United States House of Representatives  
To the Members of the Federal Communications Commission

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission  
Office of the Secretary

**RE: FCC Proposed Triple Carriage Must-Carry Order**

Senators, Representatives, and FCC Commissioners:

As an American Cable Association (ACA) and National Telecommunications Cooperative Association (NTCA) member, Mid-Rivers Cable Television is one of many small and medium-sized cable operators with a long history of providing high-quality, innovative video service to our communities. Mid-Rivers Cable Television serves 19 Eastern and Central Montana communities and one Western North Dakota community, with populations ranging from less than 100 to just over 8,000 people. We are offering digital and high-definition programming and digital video recorder (DVR) services in many of these communities today, and are currently making significant additional investments in facilities to offer these and other advanced services to more communities. By October 1, for example, high-definition programming will be available in the community of Circle, Montana (population 569), and communities that receive high-definition programming from Mid-Rivers today will see five additional HD channels. Mid-Rivers understands that in order to remain competitive, we must offer consumers the robust services they demand today and in the future.

Along with our fellow ACA and NTCA members, however, **Mid-Rivers is gravely concerned about the digital television carriage order.** The draft order would require cable operators to carry one signal of each broadcaster in three different formats – high definition, standard definition and analog – after February 17, 2009, and currently includes no exemptions for small cable systems. **It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation.** The upgrade costs required to comply with this mandate are substantial – upward of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not at all feasible for small cable operators to upgrade our facilities to all-digital and provide set-top boxes to all subscribers. This is especially true in the Mid-Rivers Cable Television service area, which includes several separate cable television systems spread out over more than 30,000 square miles and controlled by a number of separate head ends, many of which are isolated, stand-alone systems often serving less than 100 subscribers.

**The triple-carriage requirement would force Mid-Rivers to remove existing channels from our channel lineup, or in some instances reduce the amount of bandwidth available for broadband and voice services,** further broadening the digital divide between urban and rural consumers. In certain communities, we may be compelled to **shut down the cable systems altogether, removing a vital video competitor and the only local video option from the market.**

**The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them.** Mid-Rivers Cable Television joins with our Associations and their many other community-based members, along with the millions of subscribers they serve, in urging Legislators and Regulators to recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

**Mid-Rivers**

COMMUNICATIONS

Erin M. Lutts  
Business Development & Gov't. Affairs Mgr.  
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[www.midrivers.com](http://www.midrivers.com)

**From:** Thomas, Bob [mailto:BThomas@kbcitv.com]  
**Sent:** Thursday, September 06, 2007 11:39 AM  
**To:** Deborah Tate  
**Subject:** Cable TV Viewability Proposal

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SEP 10 2007

Federal Communications Commission  
Office of the Secretary

Madame Commissioner:

I write to express support for the Cable TV Viewability Proposal which comes before you on September 11. I am of the opinion that the transition to the digital world will ultimately be seen as a great benefit to the consumer. It is critical, however, that we protect analog cable subscribers from loss of service after February 17, 2009 and that digital signals do not suffer degradation when carried on cable systems.

Thank you for your consideration.

**Robert P. Thomas**  
**VP/General Manager**

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[www.2news.tv](http://www.2news.tv)

**From:** Carl Wilson [mailto:CWilson@pvt.com]  
**Sent:** Thursday, September 06, 2007 11:30 AM  
**To:** Deborah Tate; Kevin Martin; Jonathan Adelstein; Michael Copps; Deborah Tate  
**Cc:** Glenn Lovelace; Pat Olivas  
**Subject:** Proposed

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission  
Office of the Secretary

September 4, 2007

To the Members of the United States Senate  
To the Members of the United States House of Representatives

**Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order**

Dear Senators and Representatives:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and denying access to broadband services.



Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

Carl L. Wilson

VP- Industry and Regulatory Affairs  
Penasco Valley Telecommunications (PVT)  
4011 W. Main  
Artesia, New Mexico 88210-9566  
(505) 748-1241  
(505) 746-4142 (fax)  
cwilson@pvt.com

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SEP 10 2007

Federal Communications Commission  
Office of the Secretary

**From:** Bruce Opperman [mailto:bao@wllo.com]  
**Sent:** Thursday, September 06, 2007 11:08 AM  
**To:** Kevin Martin  
**Cc:** Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell; mmacbride@nab.org; cwilkins@nab.org  
**Subject:** Cable TV Viewability Proposal

Honorable Chairman Martin & Commissioners,

Things are beginning to move very quickly in the digital transition and February 17, 2009 will be here before we know it. Many local television stations, including NBC Lima, are launching educational efforts aimed at viewers and forming partnerships with digital television dealers in an effort to make this an exciting transition for our industry.

I am asking for your support of the Cable TV Viewability Proposal. There must be a way to guarantee that analog cable subscribers will not be disenfranchised after February 17, 2009. There is a great deal of educating to be done in a very short period of time, certainly representing a daunting task for us all. Television signals must be protected from material degradation so that all consumers can gain the full benefits of HDTV.

It is imperative that in the Lima, Ohio DMA market 185, with a cable penetration of over 74%, cable operators implement one of the two options offered in the proposal for our must-carry signal. It is critical to the American consumer, our viewers, that this Cable TV Viewability Proposal be adopted by the Commission. Thank you,

Bruce A. Opperman  
President/General Manager  
WLIO-TV/NBC & The CW Network  
Lima, Ohio 45805  
419-228-8835

**From:** Drake, Rosalie [mailto:RDrake@wcwg20.com]  
**Sent:** Wednesday, September 05, 2007 2:54 PM  
**To:** Deborah Tate  
**Subject:** FW: DTV Carriage "Viewability" Rules

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SEP 10 2007

Federal Communications Commission  
Office of the Secretary

Dear Commissioner Tate:

I am the General Manager of Pappas Telecasting's Station WCWG, the CW affiliate in Greensboro, N.C .

I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and am writing to express my strong support for the Commission's "viewability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) downconverting the digital must-carry channels and carrying both the digital and analog signals for these channels and (b) carrying the local must-carry signals in digital only and providing the necessary equipment to ensure that all subscribers can view those signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules to digital carriage, and believe that the Commission's proposal in this regard will ensure that every cable customer receives the full benefits of digital television.

Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,

*Rosalie Drake*

General Manager  
WCWG 20  
622-G Guilford College Rd.  
Greensboro, NC 27409  
336-510-2020



WFXL31 WFXL DT ALBANY GEORGIA

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SEP 10 2007

Federal Communications Commission  
Office of the Secretary

September 5, 2007

The Honorable Deborah Taylor Tate  
Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Commissioner,

In reference to the DTV Carriage Order that will be on the agenda of the September 11 FCC open meeting I want to express my support of the Cable TV Viewability Proposal. The adoption of this proposal is the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition. Furthermore, our TV signals must be protected from material degradation so that consumers can reap the full benefits of HDTV. This is a very important order for American consumers – my viewers.

Regards,

Jenny Collins  
Vice President General Manager  
WFXL FOX 31  
Albany, Georgia

1201 Stuart Avenue • Albany, GA 31707  
Phone: 229.435.3100 • Fax: 229.903.8241  
Toll Free -800-284-5501 • [www.wfxl.com](http://www.wfxl.com)

**From:** bfarris [mailto:bfarris@krcg.com]  
**Sent:** Wednesday, September 05, 2007 3:22 PM  
**To:** Kevin Martin; Michael Copps; Deborah Tate; Robert McDowell  
**Subject:** The Cable TV Viewability Proposal - DTV Carriage Order

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission  
Office of the Secretary

Honorable Chairman and Commissioners,

We would like to express our support for the cable TV Viewability Proposal – this is such an important order for our American consumers.

It will protect analog cable subscribers from loss of service after February 17, 2009 – and will ensure that digital television (DTV)

Signals will not suffer material degradation when carried on cable systems.

As a local CBS television affiliate, serving the capital city in the state of Missouri – it is important to be able to continue to reach our viewing audience and the fine citizens in the heart of Missouri. We want the consumers to be able to reap the full benefits of HDTV, and guarantee that analog cable subscribers will not be disenfranchised after the DTV transition.

Thank-you for your support in the crucial matter.

**Betsy Farris**

Vice-President/General Manager  
KRCG-TV and krcg online  
KRCG13 eYellow Pages  
573.694.3333

**From:** Paul Hoge [mailto:phoge@crosslake.net]  
**Sent:** Wednesday, September 05, 2007 3:33 PM  
**To:** Deborah Tate  
**Subject:** Triple-carriage requirement

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SEP 10 2007

Federal Communications Commission  
Office of the Secretary

September 5, 2007

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and denying access to broadband services.

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

Paul Hoge  
General Manager

Crosslake Communications  
35910 County Road 66  
PO Box 70  
Crosslake, MN 56442  
(218) 692-2442  
[phoge@crosslake.net](mailto:phoge@crosslake.net)  
<http://www.crosslake.net>

**From:** Barry Marks [mailto:marks@cbs7.com]  
**Sent:** Wednesday, September 05, 2007 12:31 PM  
**To:** Deborah Tate  
**Subject:** CableTV Viewability Proposal

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission  
Office of the Secretary

To The Honorable Deborah Taylor Tate, Commissioner:

The ownership of KOSA CBS-7, and many citizens of Odessa-Midland, Texas support the CableTV Viewability Proposal as the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition.

Also, TV signals must be protected from material degradation so that consumers can reap the full benefits of HDTV.

Sincerely,

Barry Marks  
General Manager  
KOSA CBS-7  
Odessa, Texas  
[marks@cbs7.com](mailto:marks@cbs7.com)



FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission  
Office of the Secretary

September 4, 2007

To the Members of the United States Senate  
To the Members of the United States House of Representatives

**Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order**

Dear Senators and Representatives:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and eliminating access to any broadband service for some consumers.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely, Joann King, General Manager, Cable One, Kirksville, Missouri 63501

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SEP 10 2007

Federal Communications Commission  
Office of the Secretary

**From:** Matt Kreiner [mailto:mkreiner@nbc25.net]

**Sent:** Wednesday, September 05, 2007 11:41 AM

**To:** Robert McDowell; Deborah Tate; Jonathan Adelstein; Michael Copps; Kevin Martin

**Cc:** Linda Kiouss

**Subject:** DTV Carriage - CableTV Viewability Proposal / September 11 meeting

Dear Chairman Martin and Commissioners McDowell, Tate, Adelstein and Copps:

As the General Manager of two television stations in the nation's 66th largest market (Flint, Saginaw, Bay City, Midland & other communities in Michigan), please accept our strongest possible endorsement of the Cable Viewability Proposal coming before you next week.

The Proposal addresses the two most important outcomes for consumers which need to be guaranteed in the DTV conversion:

- Protecting Analog Cable customers (and all viewers) from potential loss of service after February 17, 2009.
- Ensuring that digital television (DTV) signals will not suffer material degradation so that consumers can reap the full benefits of HDTV.

Ours is a large (13 county) market geographically, and two large cable operators (Comcast and Charter) divide the area regionally in serving as gatekeepers to our viewers. As we are also an economically challenged region, it stands to reason that analog service must remain an important link in our service to all of the viewers in our communities.

At the same time, we must be able to continue offer the full benefits of the HDTV programming to all of our viewers if we are to viably compete with the outside HDTV services offered by (and in some cases owned by) these large cable operators. To allow our offerings to become downgraded (and therefore non-competitive) would threaten the economic basis of our system of free, local broadcasting.

Thank you for your consideration of this important matter.  
Sincerely,

Matt Kreiner  
Vice President & General Manager  
NBC 25 & CW 46  
810.687.1000